

EXHIBIT B-1

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ECOFACOR, INC.

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:20-cv-00075-ADA

EXHIBIT B-1: PLAINTIFF ECOFACTOR'S WITNESS LIST¹

Pursuant to the Judge Albright's Standing Order on Pre-Trial Procedures and Requirements in Civil Cases, Plaintiff EcoFactor, Inc. submits the following witness list as Exhibit B-1 to the parties Joint Pretrial Order:

No.	Witness Name	Estimated Time for Examination
1	Shayan Habib	0.8 hours
2	Glen Okita	0.5 hours
3	Erik de la Iglesia	1.5 hours
4	David Kennedy	1 hour
5	John Palmer* ²	1 hour

The parties reserve the right to designate any witnesses from the other party's witness list. Additionally, the parties reserve the right to skip the testimony of any witness to the extent such

¹ These disclosures are preliminary in nature and are based on the information currently available to EcoFactor. EcoFactor reserves it right to amend and/or supplement these disclosures, including in response to disclosures made by Google and/or rulings by the Court.

² An asterisk indicates that the party may call the corresponding witness if the need arises.

witness's testimony is unnecessary due to stipulations of fact, agreement of the parties, or Court order.

DEFENDANT GOOGLE LLC'S OBJECTIONS TO ECOFACTOR, INC.'S WITNESS**LIST**

Defendant Google, LLC (“Google”) hereby submits the following objections to Plaintiff EcoFactor, Inc.’s trial witness list pursuant to Federal Rule of Civil Procedure 26(a)(3)(A).

Google reserves the right to modify, amend or supplement these objections throughout the balance of this case. Google also reserves the right to supplement or modify these objections in response to rulings by the Court (including on any motions).

In addition to the objections below, Google objects to EcoFactor’s assertion that it may designate individuals on Google’s witness list for use in its case-in-chief. As the plaintiff, EcoFactor must present its case first; it cannot withhold from Google those witnesses it plans to call for its case-in-chief.

Witness Name	Estimated Time for Examination	Google’s Objections
Shayan Habib	0.8 hours	
Glen Okita	0.5 hours	
Erik de la Iglesia	1.5 hours	
David Kennedy	1 hour	FRE 702. Google’s Motion to Exclude Expert Testimony of David Kennedy. (Dkt. No. 114).
John Palmer	1 hour	FRE 702. Google, ecobee, Inc. and Vivint, Inc’s Motion to Exclude Certain Testimony of Dr. Palmer. (Dkt. No. 114).